

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KELLY BOLDING, MICHAEL MANFREDI,  
and SARAH WARD, individually and on behalf  
of a class of all others similarly situated,

Plaintiffs,

v.

BANNER BANK, a Washington Corporation,

Defendant.

No. C17- 0601RSL

**CORRECTION TO  
DECLARATION OF KARL  
PETERSON [DKT. 112]**

I, Karl Peterson, declare as follows:

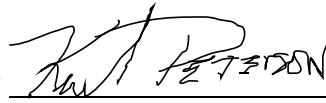
1. ***Identity of Declarant.*** I am employed by Banner Bank (“Banner”) in Boise, Idaho. I have been employed by Banner since August 1, 2011. My current position at Banner is Information Security Office Director. I am over the age of 18 years and have personal knowledge of the matters stated in this Declaration. If called and sworn as a witness, I would testify competently to them.

2. ***Corrections to My August 6, 2018, Declaration.*** On August 6, 2018, I executed a declaration [Dkt. 112] which I understand Banner filed with its response to Plaintiffs’ Motion to Compel. I have two corrections to make to that declaration. First, I made a mistake regarding where I am employed by Banner. Instead of Spokane, Washington, I have been

1 employed by Banner in Boise, Idaho since 2011. Second, I made a mistake regarding the date  
2 Iron Mountain was instructed to suspend deleting Banner's back-up tapes. Instead of January  
3 2018, Banner Bank suspended the deletion of its back-up tapes by Iron Mountain in March  
4 2018. But Iron Mountain's preservation of back-up tapes dating back to October 28, 2017, as  
5 stated in my declaration, was and remains correct to the best of my knowledge and belief.

6 Executed at Boise, Idaho, on December 5, 2018.

7  
8 By



9 Karl Peterson  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

**CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 2018, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure

Dated this 5th day of December, 2018.

By s/ Kenneth E. Payson

Kenneth E. Payson, WSBA # 26369

**CORRECTION TO DECLARATION OF KARL PETERSON**

(C17-0601RSL) - 3

4848-2049-9329v.1 0058243-000340

Davis Wright Tremaine LLP

LAW OFFICES

1201 Third Avenue, Suite 2200

Seattle, WA 98101-3045

206.622.3150 main · 206.757.7700 fax